

EXHIBIT F

Proposed Rule 34 Discovery Requests to Pharmacy/Retailer Entities

Proposed Instructions Applicable to All Responses:

- All RFPs are subject to individual Responding Party objection and/or statement that such documents do not exist, and/or are not in the custody/control of the Responding Party.
- VALSARTAN is defined as generic valsartan and includes valsartan HCl.
- Responding Party reserves the right to redact or withhold responsive documents for privilege, to protect commercially sensitive information, or to protect PPI, as is appropriate.
- All responsive documents will be produced in accordance with the protective order regarding dissemination of confidential information and documents, the ESI order, and any other applicable discovery orders entered by the Court.

Proposed Requests

Sourcing / Tracking

1. Document(s) sufficient to identify when and from whom Responding Party purchased recalled VALSARTAN, from January 1, 2012 to the present.
2. Document(s) sufficient to reflect receipt by the Responding Party of VALSARTAN subject to recall, including NDC, batch, and lot numbers, to the extent such document(s) are maintained by Responding Party in the ordinary course of business and can be obtained following a reasonable search.

Distribution

3. Document(s) sufficient to identify distribution centers of Responding Party from 2012 to present, including the location of distribution centers and states in which the distribution centers dispense.
4. Document(s) sufficient to identify the distribution centers of Responding Party that would have received VALSARTAN subject to recall.

Valsartan Recalls

5. Document(s) sufficient to reflect the initial notice from any manufacturer of VALSARTAN communicating a recall of VALSARTAN to Responding Party, including the date such notice was communicated.
6. Document(s) sufficient to reflect the initial notice from any wholesaler/distributor/supplier of VALSARTAN communicating a recall of VALSARTAN to Responding Party, including the date such notice was communicated.
7. Document(s) sufficient to reflect the initial notice from FDA communicating a recall of VALSARTAN to Responding Party, including the date such notice was communicated.

8. FDA-approved recall protocol(s) received from any manufacturer/wholesaler/distributor/FDA to be followed for any VALSARTAN subject to recall.
9. Document(s) reflecting the initial notice sent by Responding Party to individual stores/pharmacies regarding VALSARTAN subject to recall.

Testing

10. Responding Party to confirm whether Responding Party tested (or directed any third party to test on its behalf) VALSARTAN.

Consumer-Specific Documentation

11. Document(s) reflecting the purchase of VALSARTAN by NAMED PLAINTIFF from 2012 to the present, including date of purchase, dosage/strength, NDC, and price paid by NAMED PLAINTIFF.
12. Responding Party to identify whether, as a matter of course, any documents are distributed to pharmacy patients at the time of dispensation of prescription drugs, including VALSARTAN (e.g. Medication Guide), etc.
13. Provided that NAMED PLAINTIFF affirmatively certifies to have had communication with a representative of Responding Party regarding recalled Valsartan apart from and in addition to the recall letter, and has provided sufficient information regarding any such communication in Section III.B.7 of his/her substantially completed PFS, centrally-stored document(s) sufficient to reflect communications between Responding Party and NAMED PLAINTIFF regarding recalled VALSARTAN from July 1, 2018 to through December 31, 2019, including any written communications sent to or received from NAMED PLAINTIFF pertaining to recalled VALSARTAN.
14. Recall letter to NAMED PLAINTIFF
 - i. In the event the exact recall letter, if any, is not available, a sufficient response will be confirmation that a recall letter was sent, with production of the template recall letter that was sent.
 - ii. In the event no recall letter was sent, Responding Party will confirm.
15. Any centrally-stored records reflecting the return of VALSARTAN by NAMED PLAINTIFF from July 1, 2018 to present.

Final Policies from July 1, 2018 to the Present Regarding:

16. **Consumers**
 - i. Documents to be distributed to consumers at time of sale
 - ii. Consumer-level recall notification
 - iii. Customer complaint handling
17. **Purchasing / Receiving / Storage**
 - i. Receiving prescription drug deliveries
 - ii. Inspection of prescription drug deliveries
 - iii. Authentication of prescription drug deliveries

- iv. Storage and transport of prescription drugs
- v. Prescription drug shipping (if applicable)

18. Recalls

- i. General recall procedures
- ii. Quarantine/segregation/return of recalled product
- iii. Store-level recall notification
- iv. Consumer-level recall notification
- v. Recall reverse logistics

19. Tracking

- i. Tracking of distribution of prescription drugs pursuant to DSCSA